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BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012 Docket No. N2012-1

PUBLIC REPRESENTATIVE'S FIFTH (AND FINAL) SET OF
INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS ROSENBERG
(PR/USPS-T-3: 33-46)

(April 3, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatory. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

This interrogatory is propounded for the purpose of developing intervenor testimony. The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

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Docket No. N2012-1

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PR/USPS-T-3-33

Please refer to page 13, line 16 of your testimony where, for purposes of modeling, you assumed that each 3-digit ZIP Code workload could be transported up to 200 miles to be processed by a plant. Under current mail processing standards what is the maximum distance a 3-digit ZIP code workload could be transported?

PR/USPS-T-3-34

Please refer to Library Reference USPS-LR-N2012-1/15, file "CustomerDetails.twb" and explain how mileage bands (column O) are used within the LogicNet Optimization Model.

a. Please explain why the 3 digit ZIP Code 768 has a minimum distance of 136.2 miles to the closest processing facility (it is assigned to GROUP_150_to_160 instead of GROUP_130_to_140).
b. Please indicate if any other 3 digit ZIP Codes are assigned to a higher mileage band.

PR/USPS-T-3-35

Please confirm that the LogicNet Optimization model does not:

a. Utilize costs for transportation between mail processing facilities. If not confirmed please explain.
b. Utilize operating windows or capacity requirements for the FSS.
c. Please explain how one would calculate the capacity requirements of the FSS for use in the LogicNet Optimization Model. If additional data would be required to perform such a calculation, please provide it.

PR/USPS-T-3-36

Please refer to Library reference USPS-LR-N2012-1/13, Worksheet "Model MODS" rows 16 through 17 provide the operating windows for DPS Sort used in your model.

a. Please confirm that the 2nd pass of the DPS Sort ends at 7:09 am on day two.
b. Please also confirm that the proposed operating window for DPS sort, at page 35 of your testimony ends at 4 am.
c. Please reconcile these apparent discrepancies.

PR/USPS-T-3-37

Please confirm that a shorter window of 7 hours for cancellation and outgoing primary, instead of the 12 hours used in your LogicNet model, more facilities would be needed to accommodate the increased footprint? If not confirmed please explain.

PR/USPS-T-3-38

Please refer to page 17, lines 10 through 15 of your testimony where you indicate that 61 sites from the LogicNet output were deactivated and 71 sites not in the LogicNet output were activated.

a. Please confirm this results in 187 facilities.
b. Please reconcile this figure with the 199 facilities referred to on page 34, line 17, of your testimony, where you indicate that there are 199 facilities.
c. Please explain when these additional 12 facilities were added and what was the basis for their addition?

PR/USPS-T-3-39

Please refer to Section E on pages 21 through 34 of your testimony and Library reference USPS-LR-N2012-1/18, which contains the DPS tool. Please explain and show your detailed calculations for Sections E-1 (AFCS), E-2 DBCS?, E-3 (AFSM100), E-4 (APPS and APBS), E-5 (Material handling), and E-6 (Staging).

PR/USPS-T-3-40

Please confirm that on page 26 of your testimony, lines 3 through 8 you indicate that when the proposed equipment for a site was constrained by the facility's workroom square footage multiple DPS sort schemes were consolidated to reduce the total number of machines needed by triple and quadruple banking the machines.

a. In how many sites did you need to make this change to triple and quadruple bank machines?
b. What fraction of the total number of facilities does this represent?

PR/USPS-T-3-41

Please refer to page 21 of your testimony, lines 20 and 22 you indicate that you modeled the AFCS requirement using the 75th percentile of volume and the DBCS requirement for outgoing primary using the 95th percentile of volume.

a. Please confirm that Library reference USPS-LR-N2012-1/17 uses the same traffic volume as library reference USPS-LR-N2012-1/13 (which uses average traffic volumes).
b. Please explain where and how the 75th and 95th percentile are accounted for in library reference USPS-LR-N2012-1/17.

PR/USPS-T-3-42

Please refer to page 25 of your testimony line 1, where you indicate that the DBCS requirement for DPS was determined using a peak factor of 120 percent of Fiscal Year 2010 average daily volume. In footnote 33 you indicate that the peak factor for the 95th percentile from 2009 data is 126 percent. Please explain which peak factor was used and reconcile this apparent discrepancy.

PR/USPS-T-3-43

In USPS-LR-N2012-1/13 equipment square footage was inflated by 15 percent (cell H3 in "Model MODS"). In USPS-LR-N2012-1/17 equipment square footage was inflated by 20 percent (cell AT3 in "Model MODS") to ensure adequate staging room under the new service standard. Please explain the discrepancy in square footage requirements between the two models.

PR/USPS-T-3-44

In "Model MODS" of both USPS-LR-N2012-1/13 and USPS-LR-N2012-1/17 a factor of 0.8 is used to calculate square footage requirements per hour for DBCS when both outgoing primary and DPS Sort processes are occurring. See Column BU in worksheet "Model MODS" in USPS-LR-N2012-1/17.

a. Please explain why a factor of 1 is not used?
b. Would your analysis change if a factor of 1 is used instead of 0.8?
c. If so, how would it change and what would be the implications?

PR/USPS-T-3-45

Please refer to footnotes 26, 27, and 33 in your testimony. Please provide peak factors for the 96th, 97th, 98th, 99th percentile volumes for cancellation, outgoing primary, and DPS letters.

PR/USPS-T-3-46

Please refer to footnote 35 in your testimony. Please provide peak factors for the 96th, 97th, 98th, 99th percentile volumes for, outgoing primary, incoming primary, and incoming secondary for flats.